

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

NST GLOBAL, LLC, d/b/a SB TACTICAL,

Plaintiff,

v.

SIG SAUER, INC.,

Defendant.

Case No. 1:19-cv-00121-CFC

**DECLARATION OF LAURA L. CARROLL IN SUPPORT OF
DEFENDANT SIG SAUER, INC.'S MOTION TO TRANSFER**

I, Laura L. Carroll, declare pursuant to 28 U.S.C. § 1746, that:

1. I am a lawyer and partner at the law firm of Burns & Levinson LLP, 125 Summer Street, Boston, MA 02110. I am one of the attorneys representing SIG Sauer, Inc. ("SIG Sauer"), the defendant in this lawsuit. I am admitted to practice in the state and federal courts in New Hampshire and Massachusetts, as well as the U.S. Courts of Appeals for the Federal and First Circuits, and the U.S. Supreme Court.

2. I am over the age of 18, and am of good health and sound mind to make this declaration in support of SIG Sauer, Inc.'s Motion to Transfer to the District of New Hampshire. I have personal knowledge of the matters stated herein.

3. The Complaint (D.I. 1) in this action, filed by plaintiff NST Global, LLC d/b/a SB Tactical ("SB Tactical"), alleges that SB Tactical is a Florida limited liability company ("LLC"), with its "principal place of business at 1225 Darlington Oak Circle NE, St. Petersburg, Florida 33703." (D.I. 1, ¶ 3.)

4. Attached hereto as Exhibit A is a true and correct copy of the 2018 annual report filed by SB Tactical with the Florida Secretary of State on March 26, 2018. That annual report lists the 1225 Darlington Oak Circle NE, St. Petersburg, FL address as the principal place of business for SB Tactical.

5. Attached hereto as Exhibit B is a true and correct copy of a property listing for that address, 1225 Darlington Oak Circle NE, St. Petersburg, FL on the real estate website, Realtor.com: https://www.realtor.com/realestateandhomes-detail/1225-Darlington-Oak-Cir-NE_Saint-Petersburg_FL_33703_M69533-77290, as of March 25, 2019. Exhibit B describes the property as a “magnificent Executive Estate,” with six bedrooms and other residential features. There is no mention in the listing that the property is a place of business.

6. Attached hereto as Exhibit C is a true and correct copy of a property listing for the 1225 Darlington Oak Circle NE, St. Petersburg, FL property on the real estate website, BlockShopper.com, <https://blockshopper.com/fl/pinellas-county/st-petersburg/property/173105719210020070/1225-darlington-oak-circle-ne>, as of March 26, 2019, which identifies Alessandro R. Bosco and Lisa Durello as the owners of that property. Mr. Bosco is the sole named inventor of the two patents-in-suit. *See* Complaint (D.I. 1), Exhs. A&B.

7. Attached hereto as Exhibit D are true and correct copies of photographs which I took on February 3, 2019, of SB Tactical’s place of business, located at 566 Harvey Road, Manchester, New Hampshire 03103.

8. Attached hereto as Exhibit E is a true and correct copy of the 2019 annual report filed by SB Tactical with the New Hampshire Secretary of State’s Office on February 25, 2019. The report identifies the St. Petersburg, FL address as the “current principal office.” The report

identifies Jeffry Creamer as SB Tactical's President and Resident Agent, at the 566 Harvey Road, Manchester, NH address.

9. Attached hereto as Exhibit F is a true and correct copy of the "Contact Us" information on SB Tactical's website, <https://www.sb-tactical.com/contact/>, as of March 24, 2019. The telephone number for customer service has a New Hampshire area code (603).

10. Attached hereto as Exhibit G is a true and correct copy of a report for 566 Harvey Road, Manchester, NH 03103, obtained on March 23, 2019, from a background check website, BeenVerified.com. The report states (on page 5) that the 566 Harvey Road property was sold to BC Property Management LLC on December 21, 2017.

11. Attached hereto as Exhibit H is a true and correct copy of the Certificate of Formation of BC Property Management LLC as a New Hampshire Limited Liability Company, filed at the New Hampshire Department of State on November 1, 2017. The principal office of that LLC is identified in the Certificate of Formation as 41 Bellwether Lane, Chester, NH 03036, and the initial registered agent is identified as Jessica Pace, at that same address.

12. Attached hereto as Exhibit I is a true and correct copy of the 2018 annual report for BC Property Management LLC, filed at the NH Dept. of State on January 1, 2019. That report identifies Jessica Pace as that LLC's member and resident agent, with an address of 41 Bellwether Lane, Chester, NH 03036.

13. Attached hereto as Exhibit J is a true and correct copy of Jessica Pace's online LinkedIn profile, as of March 24, 2019. The profile identifies her as the Director of Operations & Inventory Management at SB Tactical in New Hampshire.

14. Attached hereto as Exhibit K is a true and correct copy of a Warranty Deed for the property located at 41 Bellwether Lane, Chester, NH, showing that it was purchased on April 22, 2016 by Jeffry Creamer and Jessica Pace.

15. Attached hereto as Exhibit L is a true and correct copy of the listing for 41 Bellwether Lane, Chester, NH 03036, in Whitepages.com, an online directory and reverse address website, as of March 24, 2019. The property is identified as a single-family residence, and lists Jessica Pace and Jeffry Creamer as residents at that property.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 26, 2019, at Boston, MA.



Laura L. Carroll

Burns & Levinson LLP

Attorney for Defendant SIG Sauer, Inc.

CERTIFICATE OF SERVICE

I, Helena C. Rychlicki, Esquire, certify that, on March 27, 2019, a copy of the *Declaration of Laura Carroll in Support of Defendant SIG Sauer, Inc.'s Motion for Transfer to the District of New Hampshire* was served via electronic notification on those individuals who receive CM/ECF notices in this case.

/s/ Helena C. Rychlicki
Helena Rychlicki (DE No. 3996)